

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

AMERICAN ALLIANCE FOR EQUAL
RIGHTS, a nonprofit corporation,

Plaintiff,

v.

KAY IVEY, in her official capacity as Governor
of the State of Alabama,

Defendant.

Civil Action No. 2:24-cv-00104-RAH- JTA

MOTION TO INTERVENE

Pursuant to Federal Rule of Civil Procedure 24, Proposed Intervenor, the Alabama Association of Real Estate Brokers, a trade association and civil rights organization for Black real estate professionals, hereby moves to intervene.

Proposed Intervenor seeks to participate in this case to present a fulsome defense of the legality and enforceability of the two statutory requirements related to representation and inclusivity on Alabama’s Real Estate Appraiser’s Board (“Appraisers Board”). Together, these provisions aim to remedy the legacy of racial discrimination in the housing and lending industry and ensure that members of the Appraisers Board are accountable and represent the communities that they serve. These aims are core to Proposed Intervenor’s mission of “Democracy in Housing,” and critical to its members as well.

As detailed in the accompanying memorandum, Proposed Intervenor satisfies each of the requirements for intervention as of right under Fed. R. Civ. P. 24(a). If the Court declines to grant intervention as of right, Proposed Intervenor alternatively requests that the Court grant permissive intervention under Fed. R. Civ. P. 24(b).

Respectfully submitted,

/s/ Martin E. Weinberg

Martin E. Weinberg
Ala. Bar No. ASB-0817-A61W
Law Firm of Martin E. Weinberg
P.O. Box 154
Shannon, Alabama 35142
(205)785-5575
attorneyweinberg@bellsouth.net

Victoria Nugent*
D.C. Bar. No. 470800
Sunu Chandy*
D.C. Bar No. 1026045
Brooke Menschel
Ala. Bar No. ASB-7675-Z61K
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 448-9090 Ext. 1011
vnugent@democracyforward.org
schandy@democracyforward.org
bmenschel@democracyforward.org

**Pro Hac Vice Forthcoming
Counsel for Proposed Intervenor*

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2024, I electronically filed a copy of the foregoing with the Clerk of the Court via CM/ECF which will send notification to all counsel of record.

/s/ Martin E. Weinberg
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